



## MONTEREY BAY AQUARIUM

Ms. Donna Wieting  
Chief, Marine Mammal Conservation Division  
Office of Protected Resources  
National Marine Fisheries Service  
1315 East-West Highway  
Silver Spring, MD 20910-3225

May 14, 2001

Dear Ms. Wieting:

This letter is in response to NOAA's call for comments on the Navy's LOW FREQUENCY ACTIVE SONAR worldwide proposal. I understand that the Navy proposes to establish "Offshore Biologically Important Areas (OBIAs)" in which the SURTASS LFA ships would not operate. I speak to the importance of designating the Monterey Bay National Marine Sanctuary as just such an OBIA.

That the sanctuary is in place stands as testimony to the unique and valuable natural resources contained within this exceptionally rich and diverse marine and coastal region. The natural resources of the sanctuary are well documented, and include over twenty-six species of marine mammals that live here year-round, or migrate through the sanctuary seasonally. Available studies, including those associated with the ATOC marine mammal investigations several years ago, indicate that sonar sources at the intensities and frequencies described for SURTASS LFA (160db, or greater, at 100-500Hz) are well within the levels that are known to have potentially serious impacts on the hearing, behavior and auditory apparatus of cetaceans. The Scientific Research Program conducted to evaluate the impact of SURTASS LFA on a very limited number of species demonstrated that whales change their migratory routes to avoid the sound, reduce the amount of time they sing, change the lengths of their songs, vacate areas exposed to LFA broadcasts, and perhaps experience disruption severe enough to separate mothers from calves. The potential effects on pinnipeds, sea otters, turtles and fishes are also of concern, and require considerable additional investigation before we will have clear answers to these questions.

I understand the Navy plans to remain seaward the twelve-mile zone in this area. It is my strong conviction that, in order to assure the protection of sanctuary resources, a sixty-mile limit should be in place in waters adjacent to the Monterey Bay National Marine Sanctuary. In addition, this limit should apply not only to the SURTASS LFA vessel itself, but to the SURTASS LFA sound emissions that are within limits that have been shown to have any potential adverse impacts on marine mammals or other living resources within the sanctuary. In other words, the sound sources should remain sufficiently distant to sanctuary resources that the sounds will have predictably negligible adverse impacts.

Thank you for the opportunity to comment on this proposal.

Sincerely,

Julie Packard  
Executive Director